

ORRICK, HERRINGTON & SUTCLIFFE LLP  
AMY K. VAN ZANT (SBN 197426)  
avanzant@orrick.com  
JASON K. YU (SBN 274215)  
jasonyu@orrick.com  
TAMMY SU (SBN 329652)  
tsu@orrick.com  
1000 Marsh Road  
Menlo Park, CA 94025-1015  
Telephone: (650) 614 7400  
Facsimile: (650) 614 7401

Attorneys for Plaintiff  
TRADESHIFT, INC.

Craig J. Mariam (SBN: 225280)  
cmariam@grsm.com  
Anthony D. Phillips (SBN: 259688)  
aphillips@grsm.com  
Eunice J. Liao (SBN: 330655)  
eliao@grsm.com  
GORDON REES SCULLY MANSUKHANI, LLP  
275 Battery Street, Suite 2000  
San Francisco, CA 94111  
Telephone: (415) 986-5900  
Facsimile: (877) 306-0043

Attorneys for Defendant  
BUYERQUEST, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

TRADESHIFT, INC., a Delaware corporation,  
  
Plaintiff,  
  
v.  
  
BUYERQUEST, INC., an Ohio corporation,  
  
Defendant.

Case No. 3:20-cv-1294-RS

**STIPULATION AND ORDER TO  
MODIFY DISCOVERY  
DEADLINES**

STIPULATION AND [PROPOSED] ORDER  
TO MODIFY DISCOVERY DEADLINES  
CASE NO. 3:20-CV-1294-RS

**STIPULATION TO MODIFY DISCOVERY DEADLINES**

Tradeshift, Inc. (“Tradeshift”) and BuyerQuest, Inc. (“BuyerQuest”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, the Court issued an Initial Case Management Order on June 2, 2020 (DE 36) identifying certain deadlines for fact discovery, expert reports, expert discovery, and dispositive motions;

WHEREAS, the parties have engaged and continue to engage in good faith conferrals regarding discovery disputes;

WHEREAS, the parties have submitted one discovery dispute to the Magistrate Judge for resolution and expect to submit at least one additional issue to the Magistrate Judge for resolution;

WHEREAS, the parties believe they will need additional time to resolve their discovery disputes and complete depositions and, as a result, have stipulated to a proposed revised schedule for completing discovery,

WHEREAS, the parties’ proposed revised schedule will not alter the trial date in this case;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their respective counsel of record and subject to the approval of the Court, that the dates in the June 2, 2020 Initial Case Management Order shall be modified as follows:

Event	Current Deadline	New Deadline
Fact Discovery Cutoff	February 19, 2021	March 22, 2021
Opening Expert Reports	March 26, 2021	April 26, 2021
Rebuttal Expert Reports	April 23, 2021	May 24, 2021
Expert Discovery Cutoff	May 28, 2021	June 21, 2021
Dispositive Motion Hearing	August 5, 2021	No Change
Pretrial Conference	October 20, 2021	No Change
Trial	November 1, 2021	No Change

1 Dated: January 21, 2021

By: /s/ Amy K. Van Zant  
AMY K. VAN ZANT  
Attorneys for Plaintiff  
TRADESHIFT, INC.

4 Dated: January 21, 2021

By: /s/ Anthony Phillips  
ANTHONY PHILLIPS  
Attorneys for Defendant  
BUYERQUEST, INC.

7 **ATTESTATION**

8 I attest that, under Civil Local Rule (5-1)(i)(3), I have obtained concurrence in the filing of  
9 this document from all Signatories.

10 /s/ Amy K. Van Zant  
11 Amy K. Van Zant

13 **IT IS SO ORDERED**

14 Dated: January 21, 2021

15   
16 RICHARD SEEBORG  
17 United States District Judge